



# CITY OF HOUSTON

Mayor's Office of Public Safety & Homeland Security

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Via Electronic Submission

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Secretary Dortch,

I appreciate the opportunity to provide comment on proposed modifications to the existing Wireless Emergency Alerts (WEA) rules and processes. Houston is one of the nation's most populous (ranked fourth), geographically largest (600 square miles), and most diverse (more than 90 languages spoken) cities. Additionally, Houston experiences high vulnerabilities to natural, technological and man-made threats. With these challenges in mind, the City of Houston works continually to improve our emergency response, in an effort to minimize loss of life and property.

We are fully engaged in using emerging technology to reach people when they need it most - with timely, accurate, actionable, and accessible protective actions. We believe the proposed WEA changes, listed below, represent necessary and welcome improvements to this service. These changes will enhance communication efforts of the emergency response agencies charged with engaging with the public during times of catastrophe.

**Embedded References and Pictures:** The City believes that the use of media, such as photos, videos and audio files would augment our ability to communicate protective actions to residents. It would also increase accessibility to alert messages, especially to those people with Access or Functional Needs who may have a communication or intellectual barrier that would prevent them from understanding a message otherwise.

**Device-Assisted Geo-targeting:** One of the concerns that arises using WEA is the high likelihood of over-alerting within an area. We want to be able to push a message to a specific portion of our jurisdiction and allow for the provision of unique protective actions. In many situations, different protective actions may be required for different geographic segments of the population. Device-Assisted Geo-Targeting would allow us to better provide information to affected individuals, while reducing undue concern in neighboring areas.

In some of our previous responses, we shied away from using WEA because of this exact issue, and we believe we could have more effectively used this technology had geo-targeting been more granular than

it currently is. We would anticipate using this technology in a wider array of responses with additional granularity measures in message distribution.

Houston continues to be a leading city for national sports and special events, such as the NBC All-Star Game (2013), NCAA Final Four (2016), and Super Bowl 51 (February 2017). The ability to Geo-target specific event venues, locations, and routes would improve the City's overall ability to communicate in a catastrophic event. This would expand the ability for the City, in coordination with applicable federal law enforcement agencies, to provide immediate protective actions to event participants.

**Multilingual Capabilities:** The City of Houston is one of the most diverse cities in the United States, According of the latest US Census Bureau statistics<sup>1</sup>, over 46% of Houstonians speak a language other than English at home. Internally, the City has developed policies<sup>2</sup> to improve language access to information deemed "essential", including our response-related information. Having the ability to push messages to phones in languages other than English would improve our ability to improve access to our residents with limited English proficiency.

**"Many-to-One" Capability:** In emergency responses, situational awareness is key. The ability to poll emergency survivors for specific information would help us better deploy resources and improve our awareness of the impact of a variety of hazards. This would most definitely improve response times and better target services to affected residents in the immediate aftermath of an event.

The City of Houston sincerely appreciates the Commissions' efforts to improve WEA and looks forward to continuing to support the use of emerging technology to protect lives and help Americans better respond to, and recover from, disasters.

Respectfully,



Dennis J. Storemski  
Director

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<sup>1</sup> <http://www.census.gov/quickfacts/table/PST045215/4835000>

<sup>2</sup> City of Houston Administrative Policy 2-11: Language Access (<http://www.houstontx.gov/adminpolicies/2-11.html>)